

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>)	14-CRB-0010-CD/SD
)	(2010-2013)
In the Matter of)	
)	
Distribution of)	
<u>Satellite Royalty Funds</u>)	

**ALFRED GALAZ DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' OPPOSITION TO SETTLING
DEVOTIONAL CLAIMANTS' MOTION TO DE-DESIGNATE
RESTRICTED MATERIALS.**

I, ALFRED GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants' *Opposition to Settling Devotional Claimants' Motion to De-Designate Restricted Materials*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2. REDACTED

3. I have never been identified as either a “partner” or “director” of WSG, and am informed that no such designation even exists for limited liability companies. My interest was solely as a “member”, which interest in WSG concluded in December 2017,

REDACTED

4. In fact, according to the SDC in a prior motion, “Alfred Galaz appears to have signed” the 2018 report. This assertion is a blatant misrepresentation by the SDC, as my signature does not appear on such document, nor the “signature” of any person. The SDC’s representation was evidently false, and I consider it to be a knowing representation intended to deceive the Judges.

5. As has now been publicized by the SDC, in May 2019 I filed for bankruptcy protection.

REDACTED

When I inquired whether I should amend my bankruptcy petition in order to correct this error, I was informed by my bankruptcy legal counsel that because there would be literally zero consequence upon the merits of my bankruptcy filing, counsel considered amendment unnecessary.

6. Until the public revelation of my bankruptcy filing, I had not discussed the matter with any WSG representative, [Redacted] While I understand it to be a matter of public record, it was a private matter, and I had no intention of revealing it to any of the foregoing persons.

Public

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 17th day of March, 2020, at Tulsa, Oklahoma.

_____/s/_____
Alfred Galaz

Proof of Delivery

I hereby certify that on Wednesday, March 18, 2020, I provided a true and correct copy of the ALFRED GALAZ DECLARATION IN SUPPORT OF MULTIGROUP CLAIMANTS' OPPOSITION TO SETTLING DEVOTIONAL CLAIMANTS' MOTION TO DE-DESIGNATE RESTRICTED MATERIALS to the following:

Settling Devotional Claimants (SDC), represented by Michael A Warley, served via Electronic Service at michael.warley@pillsburylaw.com

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com

Public Television Claimants (PTC), represented by Dustin Cho, served via Electronic Service at dcho@cov.com

MPA-Represented Program Suppliers (MPA), represented by Lucy H Plovnick, served via Electronic Service at lhp@msk.com

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com

Joint Sports Claimants (JSC), represented by Daniel A. Cantor, served via U.S. Mail

Signed: /s/ Brian D Boydston